

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GUARDIAN INDUSTRIES CORP.,

Plaintiff,

v.

DELL, INC.; GATEWAY, INC.;
HEWLETT-PACKARD COMPANY; ACER INC.;
ACER AMERICA CORPORATION; AOC INTERNATIONAL;
ENVISION PERIPHERALS, INC.; TPV TECHNOLOGY, LTD.;
TPV INTERNATIONAL (USA), INC.;
AU OPTRONICS CORPORATION;
AU OPTRONICS CORPORATION AMERICA a/k/a
AU OPTRONICS AMERICA, INC.;
BENQ CORPORATION; BENQ AMERICA CORPORATION;
CHUNGHWA PICTURE TUBES, LTD. a/k/a
CHUNGHWA PICTURE TUBES COMPANY;
TATUNG COMPANY;
TATUNG COMPANY OF AMERICA, INC.;
BOE HYDIS TECHNOLOGY COMPANY, LTD.;
BOE HYDIS AMERICA INC.; CHI MEI OPTOELECTRONICS;
COMPAL ELECTRONICS, INC.;
HANNSTAR DISPLAY CORPORATION; JEAN CO., LTD.;
LITE-ON TECHNOLOGY CORPORATION;
LITE-ON, INC. a/k/a LITEON TRADING USA, INC.;
MAG TECHNOLOGY COMPANY, LTD.;
MAG TECHNOLOGY USA, INC.;
PROVIEW INTERNATIONAL HOLDINGS, LTD.;
PROVIEW TECHNOLOGY, INC.;
PROVIEW ELECTRONICS COMPANY, LTD.; and
QUANTA DISPLAY, INC.

Defendants.

Case No.: 05-27-SLR

Jury Trial Demanded

DECLARATION OF JEAN CO., LTD. IN SUPPORT OF MOTION TO STAY

I, Jeffery Chen, declare as follows:

1. I have been continuously employed by Jean Company, Ltd. ("Jean"), since December 1995. I am currently the Director of Video Display Division. As part of my responsibilities, I have knowledge of Jean's manufacture of televisions and computer monitors and I have access to documents concerning that topic.
2. Although televisions and computer monitors manufactured and sold by Jean contain liquid crystal display ("LCD") modules, Jean does not, nor has it ever, manufactured or designed LCD modules. Instead, Jean purchases modules from LCD suppliers.
3. All televisions or computer monitors manufactured or sold by Jean contain LCD modules that were manufactured by other defendants named above in the caption of this litigation.
4. Because Jean purchases complete LCD modules and does not need to know the performance characteristics of the underlying components, Jean has virtually no information regarding the components that comprise the LCD panels contained in the modules that it purchases, the arrangement of those components in the panels, nor the specific performance characteristics of those components.
5. I have reviewed the First Amended Complaint filed by the plaintiff and, specifically, paragraph 43, which states, "On information and belief, Defendants each sell LCD product(s) that include a version of Fuji Wide View (WV) film." However, Jean does not know, and does not have a need to know, the technical details such as which films, if any, are contained in the LCD panels of the products it sells.

6. I declare the foregoing to be true and correct under the penalty of perjury under the laws of the United States, and that this declaration was executed on June 8, 2005 in Taipei, Taiwan.

A handwritten signature in cursive script that reads "Jeffery Chen" followed by the date "6/8/05". The signature is written above a horizontal line.

Jeffery Chen

CERTIFICATE OF SERVICE

I hereby certify that on June 14, 2005 I electronically filed the foregoing with the Clerk of Court using CM/ECF which will send notification of such filing(s) to the following and which has also been served as noted:

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I hereby certify that on June 14, 2005 the foregoing documents were sent to the following non-registered participants in the manner indicated.

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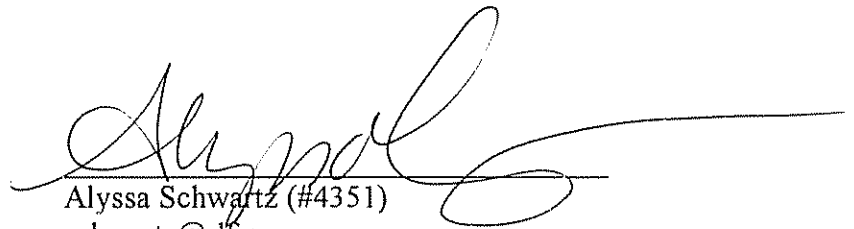
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